



DISTRICT OF COLUMBIA WATER AND SEWER AUTHORITY

5000 OVERLOOK AVENUE, S.W., WASHINGTON, D.C. 20032

July 11, 2006

Karen D. Johnson (3WP32)
Chief, Groundwater and Enforcement Branch
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Subject: 2005-2006 Priority Replacements Report (Paragraph 82)

Dear Ms. Johnson:

We are in receipt of your letter of June 27, 2006, concerning our Final Report for the 2005-2006 Priority Replacements, completed as part of the Lead Service Replacement Program (Final Report) that was submitted on May 9, 2006. In that Final Report we noted that the May 9, 2006 Report was final and superseded previous reporting on the priority replacement program.

In your letter you requested clarification as to differences you noted between earlier lead service replacement reports, the interim priority report and the Final Report of 1016 replacements which were completed to fulfill the required completion of 1000 replacements. We noted that none of the clarifications requested concerned the reporting of the 1016 priority replacements, which were the subject of the Final Report. You are aware of the continuing Quality Assurance and Quality Control efforts that WASA has undertaken, however you may not be aware that that effort is one of continuous improvement. We continue to recognize throughout our organization the importance of reporting, and the particular importance of the priority replacement program not only to EPA but also to the community we serve. WASA in preparation for the submission of this report undertook a thorough review of the priority program by a third party. In performing that review, WASA had hoped to present a report that satisfied the Administrative Order and would require little if any research or follow-up by either your Regional Office or our staff. Based on that review and the fact that significantly more replacements had been completed than the 1000 that were required by the Administrative Order, WASA chose a subset of the completed priority replacements to report. That subset is reported as the Final Report and includes some replacements that had not been classified as priority replacements or excludes certain other locations that may have appeared in earlier interim reports.

The Final Report listed 1016 addresses for which Lead Service Replacement (LSR) had been accomplished, the completion (installation) date of the construction for the public side, and which criteria qualified the address for inclusion in the priority program. As you note in your letter, paragraph 82 of the Administrative Order for Compliance on Consent (SDWA 03-2004-0259-DS) ("Order") required that 1000 lead service lines be replaced under the program.

2. Inclusion of eleven (11) new addresses in the May 9, 2006, Priority LSR Report not previously reported in the September 30, 2005, Interim LSR Report, although in the period covered by the Interim Report.

The eleven addresses noted were all indeed completed during the period covered by the September 30, 2005, Interim LSR Report and were eligible for reporting at that time. The internal quality assurance verification procedures conducted prior to preparation of this Final Report compared both the planning and reporting database used to plan and track the implementation of the LSR program, and other available data including source data. The internal quality assurance verification procedures compared our previous interim reports and identified these additional eligible locations and we have included them in this Final Report. These addresses had not previously been reported and had not been included in the earlier Interim Report. - final was submitted Nov 18

3. Inclusion of six (6) addresses as Priority LSRs in the May 9, 2006, Priority LSR Report that had been previously reported as completed LSRs in the September 2005 Interim Report but not designated as Priority replacements.

These six addresses, which are listed in the table below, are correctly characterized in the May 9, 2006, Final Report. Again the internal quality assurance verification procedures conducted prior to preparation of this Final Report compared both the planning and reporting database used to plan and track the implementation of the LSR program, and other available data including source data. Although these locations were not classified as priority replacements in the earlier report, we confirm that inclusion of these under the "Priority" requirement is an appropriate classification.

Address	quad	Criterion	activity	activity date
South Carolina Ave	SE	Daycare	LSLR	29-Dec-04
Hall Pl	NW	Pop-at-Risk	LSLR	31-Aug-05
Woodley Pl	NW	Pop-at-Risk	LSLR	1-Aug-05
NH Burroughs Ave	NE	Daycare	LSLR	8-Oct-04
13th St NW	NW	Pop-at-Risk	LSLR	23-Feb-05
OF St	NE	Pop-at-Risk	LSLR	12-Jan-05

4. Inclusion in May Priority LSR Report of thirteen (13) addresses previously reported as replaced by "test-out" during the 2003 replacement year.

These thirteen addresses were apparently deemed replaced by "test-out" during the initial 2003 replacement year, which was consistent with the provisions of 40 CFR 141.84 (c). However, the specific provisions of the Order issued require that replacement of services under the Priority LSR program be accomplished by physical replacement rather than "test-out," and these thirteen addresses qualified for inclusion in that program based on the Daycare and Population-at-Risk